

JAMES R. OLSON, ESQ.
Nevada Bar No. 000116
WALTER R. CANNON, ESQ.
Nevada Bar No. 001505
STEPHANIE A. BARKER, ESQ.
Nevada Bar No. 003176
OLSON CANNON GORMLEY & STOBERSKI
9950 West Cheyenne Avenue
Las Vegas, NV 89129
Phone: 702-384-4012
Facsimile: 702-383-0701
Email: jolson@ocgas.com
wcannon@ocgas.com
sbarker@ocgas.com

AND

CLARK COUNTY SCHOOL DISTRICT
OFFICE OF THE GENERAL COUNSEL
CRYSTAL J. HERRERA, ESQ.
Nevada Bar No. 012396
5100 West Sahara Avenue
Las Vegas, NV. 89146
Phone: 702-799-5373
Facsimile: 702-799-7243
Email: Herrec4@nv.ccsd.net
Attorney for DEFENDANTS
Clark County School District and Board of
Trustees of the Clark County School District

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

SARA QUINTANA,

Plaintiff,

vs.

CASE NO. 2:21-cv-00023-CDS-NJK

CLARK COUNTY SCHOOL DISTRICT, a
political subdivision of the State of Nevada;
and the BOARD OF TRUSTEES OF THE
CLARK COUNTY SCHOOL DISTRICT,
in their official capacities,

Defendants.

STIPULATION AND ORDER
TO EXTEND THE DISPOSITIVE MOTION DEADLINE
(THIRD REQUEST)

1 IT IS HEREBY STIPULATED AND AGREED by Defendants CLARK COUNTY
 2 SCHOOL DISTRICT (CCSD) and the BOARD OF TRUSTEES OF THE CLARK COUNTY
 3 SCHOOL DISTRICT (BOT) through their attorneys WALTER R. CANNON, ESQ. and
 4 STEPHANIE A. BARKER, ESQ. of the law firm of OLSON CANNON GORMLEY &
 5 STOBERSKI, and CRYSTAL J. HERRERA, ESQ. of the OFFICE OF THE GENERAL
 6 COUNSEL FOR THE CLARK COUNTY SCHOOL DISTRICT; and by Plaintiff SARA
 7 QUINTANA through her attorneys JAMES P. KEMP, ESQ. of the law firm KEMP & KEMP,
 8 and JAMES A. HILL, ESQ. of the law firm GILBERT EMPLOYMENT LAW, P.C., that the
 9 dispositive motion deadline in this matter be extended for an additional fourteen (14) days. This
 10 is the parties THIRD post-discovery request for extension of the dispositive motion deadline,
 11 submitted for the below-stated reasons.

12 On June 3, 2022, the parties entered a Stipulation to Extend the Dispositive Motion
 13 Deadline (SECOND) to a date to be scheduled 30 days after Settlement Conference. (ECF No.
 14 48.) The Court granted that Stipulation on June 6, 2022. (ECF No. 49.) On September 22, 2021
 15 the parties participated in a Settlement Conference with United States Magistrate Judge Youchah
 16 (*see* ECF No. 50 and ECF No. 51), and were unable to reach resolution. Accordingly, the Court
 17 scheduled the dispositive motion deadline for October 22, 2022. (ECF No. 52.)

18 The parties now enter into this third Stipulation to extend the dispositive motion deadline
 19 for an additional fourteen (14) at the request of defense counsel in order to accommodate conflicts
 20 in attorney Barker's schedule associated with birth of a grandchild.

21 ///

22 ///

23 ///

24 ///

25 ///

26 ///

27 ///

28

Accordingly, the parties hereby stipulate to extend the current dispositive motion deadline of October 22, 2022, to November 4, 2022. This is the parties THIRD stipulation concerning the dispositive motion deadline.

RESPECTFULLY SUBMITTED.

DATED this 17th day of October, 2022.

KEMP & KEMP

/s/ *James P. Kemp*

JAMES P. KEMP, ESQ.
Nevada Bar No. 6375
VICTORIA L. NEAL, ESQ.
Nevada Bar No. 13382
7435 W. Azure Drive, Suite 110
Las Vegas, NV 89130
jp@kemp-attorneys.com
vneal@kemp-attorneys.com

AND

GILBERT EMPLOYMENT LAW, PC
JAMES A. HILL, ESQ.
Pro Hac Vice – ECF 24
1100 Wayne Avenue, Suite 900
Silver Spring, MD 20910
jhill-efile@gelawyer.com
Attorneys for Plaintiff

DATED this 17th day of October, 2022.

OLSON CANNON GORMLEY & STOBERSKI

/s/ *Stephanie A. Barker*

WALTER R. CANNON, ESQ.
Nevada Bar No. 001505
STEPHANIE A. BARKER, ESQ.
Nevada Bar No. 003176
9950 West Cheyenne Avenue
Las Vegas, NV 89129
wcannon@ocgas.com
sbarker@ocgas.com

AND

OFFICE OF THE GENERAL COUNSEL, CCSD
CRYSTAL J. HERRERA, ESQ.
Nevada Bar No. 012396
5100 West Sahara Avenue
Las Vegas, NV 89146
Herrec4@nv.ccsd.net
Attorneys for Defendants

IT IS SO ORDERED.

DATED: October 19, 2022



UNITED STATES DISTRICT COURT JUDGE

Law Offices of
OLSON CANNON GORMLEY & STOBERSKI
A Professional Corporation
9950 West Cheyenne Avenue
Las Vegas, Nevada 89129
(702) 384-4012 Fax (702) 383-0701